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*Counsel for Defendant Meta Platforms, Inc.*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

RICHARD KADREY, *et al.*,

## Individual and Representative Plaintiffs,

V.

META PLATFORMS, INC., a Delaware corporation;

Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DECLARATION OF NIKKI K. VO IN  
SUPPORT OF ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL JOINT DISCOVERY  
LETTER BRIEF AND EXHIBITS**

1 I, Nikki K. Vo, hereby declare:

2 1. I am a Director and Associate General Counsel for Defendant, Meta Platforms, Inc.

3 I have personal knowledge of the facts set forth in this declaration and, if called to testify as a  
4 witness, could and would testify competently thereto.

5 2. I make this declaration in support of Meta's administrative motion to file under seal  
6 the Joint Letter Brief on Meta's Motion for a Protective Order re: Plaintiff's Request to Depose  
7 Mark Zuckerberg ("Joint Letter Brief") and Exhibits E–N to the Joint Letter Brief. The motion  
8 seeks to have the following partially sealed or entirely sealed:

9 <b>Document</b>	10 <b>Sealing Request</b>
11 Joint Discovery Letter Brief	12 • Redacted portions
12 Exhibit E to Joint Discovery Letter Brief	13 • Entire document
13 Exhibit F to Joint Discovery Letter Brief	14 • Entire document
14 Exhibit G to Joint Discovery Letter Brief	15 • Entire document
15 Exhibit H to Joint Discovery Letter Brief	16 • Entire document
16 Exhibit I to Joint Discovery Letter Brief	17 • Entire document
17 Exhibit J to Joint Discovery Letter	18 • Entire document
18 Exhibit K to Joint Discovery Letter	19 • Entire document
19 Exhibit L to Joint Discovery Letter	20 • Entire document
20 Exhibit M to Joint Discovery Letter	21 • Entire document
21 Exhibit N to Joint Discovery Letter	

22 3. Exhibit E is a highly sensitive confidential document detailing non-public  
23 information concerning budget requests for various generative AI initiatives within Meta. Public  
24 disclosure of this information exposes Meta to the risk of competitive harm.

25 4. Exhibit F is an excerpt of a highly sensitive confidential discussion of Meta's  
26 licensing strategy for Llama and its competitive positioning within the generative AI market.  
27 Public disclosure of this information exposes Meta to the risk of competitive harm.

5. Exhibit G is an excerpt of a document reflecting highly sensitive confidential discussion about Meta's AI strategy with an important business partner of the company.

6. Exhibit H is an excerpt of a highly sensitive confidential discussion of branding strategy and model training techniques for Llama.

7. Exhibit I is an excerpt of a highly sensitive confidential discussion concerning the decision-making process for open release of Llama model.

8. Exhibits J and K are excerpts from a highly sensitive roadmap for objectives of AI research division of Meta and a highly sensitive internal roadmap for personalization of generative AI technology, respectively.

9. Exhibit L is an excerpt from a highly sensitive internal discussion of Meta's competitive strategy for generative AI models.

10. Exhibit M is an excerpt from a highly sensitive confidential document reflecting a competitive analysis of generative AI models and questions for internal Meta teams related to the company's business and research objectives for generative AI initiatives.

11. Exhibit N is an excerpt from a highly sensitive confidential document reflecting Meta generative AI research strategy.

12. Public disclosure of the information contained in the above-referenced exhibits exposes Meta to the risk of competitive and financial harm, by revealing Meta's non-public business strategies, trade secret information pertaining to its generative AI offerings, and competitive analyses.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in Oakland, California on this 20<sup>th</sup> day of September, 2024.

Nikki K. Vo

Nikki K. Vo